

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Newport News Division

LIBERTY COUNSEL, INC., )  
                            )  
Plaintiff,               )  
                            )  
                            v.    ) Civil Action No. 4:17-CV-71  
                            )  
                            )  
GUIDESTAR USA, INC.,    )  
                            )  
Defendant.               )  
                            )

**GUIDESTAR USA, INC.'S MOTION TO DISMISS THE COMPLAINT**

Defendant GuideStar USA, Inc., by counsel and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves the Court to dismiss the Complaint filed by Plaintiff Liberty Counsel, Inc., for failure to state a claim upon which relief may be granted. The grounds for this Motion are fully set forth in the accompanying Memorandum in Support.

Respectfully submitted,

GUIDESTAR USA, INC.

By: \_\_\_\_\_ /s/  
Sona Rewari (VSB No. 47327)  
HUNTON & WILLIAMS LLP  
2200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037  
(703) 714-7512  
(703) 918-4018 (facsimile)  
[srewari@hunton.com](mailto:srewari@hunton.com)

Gregory N. Stillman (VSB No. 14308)  
Wendy C. McGraw (VSB No. 37880)  
HUNTON & WILLIAMS LLP  
500 East Main, Suite 1000  
Norfolk, Virginia 23510  
(757) 640-5300  
(757) 625-7720 (facsimile)  
[gstillman@hunton.com](mailto:gstillman@hunton.com)  
[wmcgraw@hunton.com](mailto:wmcgraw@hunton.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of July, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

\_\_\_\_\_  
/s/  
Sona Rewari (VSB No. 47327)  
HUNTON & WILLIAMS LLP  
2200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037  
(703) 714-7512  
(703) 918-4018 (facsimile)  
[srewari@hunton.com](mailto:srewari@hunton.com)

*Counsel for Defendant*